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February 14, 2020

Kathy Denzer  
Conoco Phillips Company  
34501 E. Quincy Ave, Bldg 1  
Watkins, CO 80137

**Re: Initial Submission Review– Lone Tree North Phase 2 – Oil and Gas Permit**  
Application Number: **DA-2093-02**  
Case Numbers: **2017-6027-03**

Dear Ms. Denzer:

Thank you for your initial submission, which we started to process on Friday, January 31, 2020. We reviewed it and attached our comments along with this cover letter. The first section of our review highlights our major comments. The following sections contain more specific comments, including those received from other city departments and community members.

Since several important issues still remain, you will need to make another submission. Please revise your previous work and send us a new submission on or before Tuesday, March 2, 2020.

Note that all our comments are numbered. When you resubmit, include a cover letter specifically responding to each item. The Planning Department reserves the right to reject any resubmissions that fail to address these items. If you have made any other changes to your documents other than those requested, be sure to also specifically list them in your letter.

As always, if you have any comments or concerns, please give me a call. I may be reached at 303-739-7209.

Sincerely,

Juliana Berry, Planner II  
City of Aurora Planning Department

cc: Melinda Lundquist, CVL Consultants of Colorado Inc, 10333 E. Dry Creek Rd, Englewood, CO 80112  
Scott Campbell, Neighborhood Liaison  
Mark Geyer, ODA  
Filed: K:\\$DA\2093-02rev1.rtf



## **LONE TREE NORTH PHASE 2** **OIL AND GAS PERMIT REVIEW**

### *Initial Submittal Review*

#### **SUMMARY OF KEY COMMENTS FROM ALL DEPARTMENTS**

#### **SUMMARY OF KEY COMMENTS FROM ALL DEPARTMENTS**

- Remove the AutoCAD SHX comments and flatten the PDF for the second submission (see Item 1)
- Be consistent with the address of this application (see Item 1)
- Add in details from the final Eastern Hills South submission (see Items 1, 8, 9, 32, and the Letter of Introduction Comments)
- Be consistent with the haul routes and City of Aurora jurisdictional roads (see Items 1, 8, and 9)
- Match the well pad acreage and area of disturbance across the Plan Set's Data Block, the Letter of Introduction, and the Form 2A (see Items 1, 8, and 36)
- Add/revise labels, details, dimensions, and labels as redlined (see Items 1 and 19)
- The Road Maintenance Agreement note and associated references should reflect the executed amendment; submit the revised and executed RMA in the second submission (see Items 1 and 31)
- Choose cropland or rangeland (see Items 9 and 36)
- Match the construction dates across the Project Development Schedule, the site-specific Air Quality Plan, and the Form 2A (see Items 13, 32, and 36)
- Correct the Development Application number in the PHA-HAZOP letter (see Item 17)
- Commence the process of required License Agreements with the City (see Items 19 and 34)
- Show that the potential downgradient domestic supply monitoring well is viable for sampling (see Item 23)
- The Drainage Conformance Letter must still be approved (see Item 30)
- Complete the site-specific Air Quality Plan with available details and missing language (see Item 32)
- Make necessary revisions to the Noise Management Plan to clearly state chosen noise mitigation measures (see Item 33)
- Provide the final version of the COGCC Form 2A at the second submission (see Item 36)
- As a reminder, the City has developed CAD Data Submittal Standards for internal and external use to streamline the process of importing AutoCAD information into the city's Enterprise GIS. Please note that a digital submission meeting the CAD Data Submittal Standards is required before your final Site Plan mylars can be routed for signatures or recorded. Please review the CAD Data Submittal Standards, including templates and required layer file labeling, at <http://tinyurl.com/AuroraCAD>. Email your Case Manager the appropriate Site Plan file before submitting your final Site Plan mylars. Once received, the City's AutoCAD Operator will run an audit report and your Case Manager will let you know whether the file meets or does not meet the City's CAD Data Submittal Standards. Please email [CADGIS@auroragov.org](mailto:CADGIS@auroragov.org) for questions or more detailed instructions.
- Respond to additional redline comments

**REVIEWERS**

- Planning – Steve Rodriguez and Juliana Berry / 303-739-7186 and 303-739-7209 / [srodrigu@auroragov.org](mailto:srodrigu@auroragov.org) and [jberry@auroragov.org](mailto:jberry@auroragov.org) / Comments in dark teal
- Planning/Landscape – Kelly Bish / 303-739-7189 / [kbish@auroragov.org](mailto:kbish@auroragov.org) / Comments in bright teal
- Public Works – Kristin Tanabe / 303-739-7306 / [ktanabe@auroragov.org](mailto:ktanabe@auroragov.org) / Comments in green
- Building/Life Safety – Will Polk / 303-739-7371 / [wpolk@auroragov.org](mailto:wpolk@auroragov.org) / Comments in blue
- Traffic – Brianna Medema / 303-739-7336 / [bmedema@auroragov.org](mailto:bmedema@auroragov.org) / Comments in orange
- Real Property – Grace Gray / 303-739-7277 / [ggray@auroragov.org](mailto:ggray@auroragov.org) / Comments in magenta
- Water – Steve Dekoskie and Joshua Godwin / 303-739-7490 and 720-859-4307 / [sdekoski@auroragov.org](mailto:sdekoski@auroragov.org) and [jgodwin@auroragov.org](mailto:jgodwin@auroragov.org) / Comments in red
- Parks, Recreation, and Open Space (PROS) – Curtis Bish / 303-739-7131 / [cbish@auroragov.org](mailto:cbish@auroragov.org) / Comments in purple

**SITE PLAN COMMENTS****1. Plan Set**

- 1A. Remove the AutoCAD SHX comments and flatten the PDF for the second submission.
- 1B. Sheet 8 (Landscape)
  - Update the Landscape Buffer Requirement Table Notes to reflect evergreen trees and the correct reference to Code
- 1C. Sheet 9 (Traffic)
  - Add note similar to Traffic Letter indicating that the proposed haul route is outside the City of Aurora limits.
  - Add to legend for Haul Route in City of Aurora limits.
- 1D. Match the well pad acreage and area of disturbance across the Plan Set's Data Block, the Letter of Introduction, and the Form 2A (Planning)
- 1E. Add cattle guard locations and label on all pertinent sheets (Planning)
- 1F. Context Map on all pertinent sheets: Add a legend, and Limits of the 100 Year Floodplain, 500 Year Floodplain, Water Monitoring Locations, Access Road, and pre- & post- pipeline Haul Routes (see Eastern Hills South for an example), and the abandoned well State Smith 1-16 (Planning)
- 1G. Title Block on Sheets 1—10 and 13—15: Update the site location with the actual address (Planning)
- 1H. Vicinity Map on Sheets 1 and 2: Match the base layer from Eastern Hills South (Planning)
- 1I. Sheet Number 1 (Planning)
  - Add the cultural features distances table (see Eastern Hills South for an example)
  - Add the Arapahoe County parcel number per the redline
  - Update the language of Site Plan Note #5 to reflect the revised, executed Road Maintenance Agreement
  - The last sentence of Note #6 is not a complete sentence- revise or remove
  - Make it more clear that the shown legend is for the Context Map
- 1J. Sheet Number 2 (Planning)
  - Add the Context Map inset, revised as requested above
- 1K. Sheet Numbers 4—7 (Planning)
  - Add entry, wellhead, and tank battery signage detail insets and show/label on the layout, as applicable
- 1L. Sheet Numbers 4—6 (Planning)
  - Add fence height to all labels
  - Add dimensions and height to the berm labels
- 1M. Sheet Numbers 4—5 (Planning)
  - Add the privacy fence to the layout and the detail inset to the Sheet, or remove from the legend
- 1N. Sheet Numbers 4 & 7 (Planning)
  - Add the swinging gate and 23'-wide access road labels from Sheet 6, and add height to the gate label



**1O. Sheet Number 4 (Planning)**

- Specify in the label that the trash area is a dumpster
- Add dimensions to the temporary living quarters/offices' label
- Add the wildlife fence inset detail to the Sheet
- Add General Construction Note #8 regarding recontour, reclaim, and reseed from Eastern Hills South
- Remove the second sentence in General Construction Note #5 as it is not applicable
- Specify that Table 4-3 is for noise mitigation

**1P. Sheet Numbers 5—6 (Planning)**

- Add height to the swinging gate label

**1Q. Sheet Numbers 5 & 7 (Planning)**

- Add height to the containment wall label

**1R. Sheet Number 5 (Planning)**

- Show the entry sign and wellhead sign on the layout and label
- Add the 23'-wide access road label from Sheet 6
- Enlarge the legend, details, table, and context map to fill the unused space

**1S. Sheet Numbers 6—7 & 10 (Planning)**

- Add the pad site elevation label to the layout

**1T. Sheet Number 6 (Planning)**

- Add the sound walls to the layout, or remove from the legend
- Enlarge the legend, details, and context map to fill the unused space

**1U. Sheet Number 7 (Planning)**

- Add dimensions to the Spoils Storage labels
- Label the wellheads
- Add the privacy and wildlife fence details insets to the Sheet

**1V. Sheet Number 10 (Planning)**

- Fix the Title Block text overlap

**2. Vicinity / Context Map (Planning)**

2A. Please continue to incorporate into the overall Plan Set.

**3. Interim Reclamation Plan (Planning)**

3A. Please continue to incorporate into the overall Plan Set.

**4. Visual Mitigation Plan (Planning)**

4A. N/A

**5. Landscape Plan (Planning/Landscape)**

5A. Please continue to incorporate into the overall Plan Set.

**6. Lighting Plan (Planning)**

6A. Please continue to incorporate into the overall Plan Set.

**7. Building and Structure Elevations (Planning)**

7A. Please continue to incorporate into the overall Plan Set.

**LETTER OF INTRODUCTION COMMENTS**

The Plat Package section is not as robust as previous applications (Eastern Hills North and Rush North, as examples); please include more sheet details in the next submission.



## **8. Project Summary (Planning)**

8A. Spell out that “R2” is “Medium Density R2 District”.

8B. Match the well pad acreage and area of disturbance across the Letter of Introduction, the Form 2A, and the Plan Set’s Data Block.

8C. Is the 4.8 acres the size of the drilling pad during drilling and completion, or the size of the site after interim reclamation? See Eastern Hills South summary for an example.

8D. Add in details regarding the existing topography and slope, and stormwater flow. See Eastern Hills South summary for an example.

8E. Specify the length of the 23’-wide access roadway.

8F. Add in details regarding the pre- and post- pipeline haul routes. See Eastern Hills South summary for an example.

8G. Add in cattle guards, if applicable.

8H. Specify the height of the wildlife fence.

## **9. Applicable BMPs Addressed (Narrative List) (Planning)**

9A. **Reclamation**- Refine “cropland” to “rangeland” to match the Form 2A, or vice versa.

9B. **Transportation and Circulation**- List the pre- and post- pipeline haul routes, as per previous applications.

9C. **Water Protection Requirements**- Add in the language regarding results of the vibratory study and the 350’ setback. See Eastern Hills South for an example.

## **10. Neighborhood Meeting Schedule & Results / Response to Public Comments (Planning)**

10A. The Neighborhood Meeting Results summary is acceptable as submitted.

## **11. Response to Pre-Application Comments (Planning)**

11A. N/A

## **OPERATIONS PLAN COMMENTS**

### **12. Operations Plan (Planning)**

12A. The field-wide Operations Plan has been previously accepted by the City.

### **13. Project Development Schedule (Planning)**

13A. Match the construction dates across the site-specific Air Quality Plan and the Form 2A.

### **14. Security Plan (Planning)**

14A. The field-wide Operations Plan has been previously accepted by the City.

### **15. Decommissioning / Final Reclamation Plan (Planning)**

15A. The field-wide Operations Plan has been previously accepted by the City.

## **EMERGENCY RESPONSE PLAN COMMENTS**

### **16. Emergency Response Plan (Building/Life Safety)**

#### **Field-Wide Plan**

16A. The field-wide Emergency Response Plan has been previously accepted by the City.

#### **Site-Specific Plan**

16B. This requirement is acceptable as submitted.

### **17. PHA-HAZOP Analysis (Building/Life Safety)**

#### **Field-Wide**

17A. The field-wide PHA-HAZOP Analysis has been previously accepted by the City.

#### **Site-Specific**

17B. Please revise the letter to reflect the accurate Development Application number of DA-2093-02.



## **COMMENTS ON OTHER REQUIRED ITEMS**

### **18. Traffic Letter / Plan (Traffic)**

18A. This requirement is acceptable as submitted.

### **19. License Agreements (Real Property)**

19A. Notate recording information on the pipeline easement in Hayesmount Rd, and provide the City with a copy of the easement at the next submission.

19B. Some pages are missing labeling of road and width.

19C. If a License for the Hayesmount lateral crossing has been obtained, provide a copy with the next submission. If not, obtain a License Agreement.

19D. Work with Real Property to obtain License Agreements related to lay-flat lines.

### **20. Recorded Surface Use Agreement (Real Property)**

20A. This requirement is acceptable as submitted.

### **21. Property Owner Authorizations (Real Property)**

21A. This requirement is acceptable as submitted.

### **22. Water Delivery Method/Water Supply Plan (Water)**

#### **Water Delivery Agreement**

22A. The field-wide Water Delivery Agreement has been previously accepted by the City.

#### **Water Supply Plan**

22B. This requirement is acceptable as submitted.

### **23. Groundwater Quality Monitoring Plan (Water)**

23A. It is acknowledged that there is a potential downgradient domestic supply well that can be used for monitoring "Lone Tree North Phase 2". The operator needs to show that the monitoring well is installed, is viable for sampling, and that the owner is willing to allow for sampling.

24B. Until initial sampling, City staff and operator staff will have a standing call every other week to provide an update on the sampling effort.

24C. If applicable and as noted in the field-wide submittal, operator will notify the City at least 40 weeks prior to drilling if the "requested well" is not possible, or progress is no longer being made, and that parties (City and operator) will have to pursue the "easement well" protocol in order to comply with the monitoring well requirement.

24D. If applicable and as noted in the submittal, operator will notify the City immediately of any delays related to the Water Quality Monitoring Plan.

### **24. Fugitive Dust Suppression Plan (Water)**

24A. The field-wide Fugitive Dust Suppression Plan has been previously accepted by the City.

### **25. Fluid Disposal Plan (Water)**

25A. The field-wide Fluid Disposal / Waste Management Plan has been previously accepted by the City.

### **26. Water Use Plan CDPHE Reg. 84**

26A. N/A

### **27. Weed Control Plan (Water and PROS)**

27A. The field-wide Weed Control Plan has been previously accepted by the City.

### **28. Wildlife Impact Mitigation Plan (PROS)**

28A. This requirement is acceptable as submitted.





### **29. Stormwater Management Plan**

29A. These Civil documents will be reviewed and commented on by the standard SWMP Review team via upload through the separate Public Works portal; please contact Public Works at 303-739-7457 to set up a Pre-Submittal meeting.

29B. *FYI*: Profiles for gathering lateral pipelines crossing any Aurora Water utilities, ROWs, and floodplains will be required as part of the SWMP plan. (Water)

29C. *FYI*: Outlet structures will be required on detention basins- detail required (Water)

29D. *FYI*: An I&M plan for maintenance of all sediment and detention basins, as well as all other private stormwater infrastructure, is required to be submitted with SWMP plans.

### **30. Preliminary Drainage Report / Letter**

30A. The Drainage Conformance Letter must still be approved by Public Works.

### **31. Road Maintenance / Construction (Public Works)**

31A. Please upload the revised executed Road Maintenance Agreement at the next submission.

### **32. Air Quality Plan (Planning)**

#### **Field-Wide Plan**

32A. The field-wide Air Quality Plan has been previously accepted by the City.

#### **Site-Specific Plan**

32B. Submit a complete Plan, including confirmed monitoring locations, pre-construction baseline air monitoring results, established alert level thresholds, all pre-activity information, all location-specific considerations, any anticipated location modifications and timeline, and location data plan.

32C. The Plan should reference how the reports will include trend identification related to increases / decreases / spikes in concentration or emissions as related to the health-based criteria.

32D. Spell out what “NAAQS” and “ATSDR” stand for.

32E. Match the construction timeline (Pad Build ETA, under Monitoring Strategy) across the Project Development Schedule and Form 2A.

32F. Pre-construction baseline air monitoring (under Monitoring Strategy) is still missing language about prior notification to the City (please reference Eastern Hill South’s final submission for the preferred language, as previously agreed-upon between the City and the applicant).

32G. Specify the subject pad site as “Lone Tree North” on the map.

### **33. Noise Management Plan (Planning)**

33A. Specify the chosen sound mitigation measures (berms, acoustical wall, and acoustical panels) in Section 3.3, 3<sup>rd</sup> paragraph, last sentence, instead of listing all of the possible options.

### **34. Application Form (Planning)**

#### **Checklist**

34A. Revise License Agreements to reflect requirement for lay-flat lines, and Hayesmount lateral crossing if applicable; delete the “N/A” accordingly.

### **35. 1-Mile Radius Abutters List (Planning)**

35A. This requirement is acceptable as submitted.

### **36. COGCC Forms / 2A (Planning)**

36A. Match the well pad acreage and area of disturbance across the Form 2A, the Plan Set’s Data Block, and the Letter of Introduction.

36B. Match the construction dates across the Project Development Schedule and the site-specific Air Quality Plan.

36C. Match the Current and Future Land Use type(s) to the Letter of Introduction (rangeland versus cropland in the Summary and Reclamation BMP, respectively).

36D. Upload the final version at the next submission.